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ALLIANCES IN MEXICO
AND SRI LANKA

November 15, 2021

VIA ECF

The Honorable Thomas Vanaskie
Special Discovery Master
Stevens & Lee
1500 Market Street, East Tower, 18th
Floor
Philadelphia, PA 19103

**Re: *In re Valsartan, Losartan, and Irbesartan Products Liability
Litigation, Case No. 1:19-md-02875-RBK-KW***

Judge Vanaskie:

We write on behalf of the ZHP Parties, and jointly with Plaintiffs, to report on the results of the parties' meet and confer with respect to the confidentiality designations for the documents attached to ECF Nos. 826, 967, 1189, and 1250, and the deposition testimony of Lijie Wang and John Iozzia (and the exhibits to those depositions) pursuant to Special Master Order ("SMO") No. 49 dated October 25, 2021, ¶ 2, (ECF No. [1667](#)) and SMO No. 52, dated November 8, 2021 (ECF No. [1731](#)).

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The parties met and conferred on November 11, 2021, and reached the following results:

1. The ZHP Parties have agreed to de-designate nine (9) documents:
 - a. ZHP01990527 (ECF No. 826, Ex. 26)
 - b. ZHP00343422, 24 (ECF No. 826, Ex. 27)
 - c. ZHP00324685 (ECF No. 826, Ex. 28)
 - d. ZHP00325765 (ECF No. 826, Ex. 42)
 - e. ZHP00827481 (ECF No. 826, Ex. 51)
 - f. 4/22/2021 Tr. of Min Li Dep., 581:9-588:9, 589:20-598:7, 602:6-604:6 (ECF No. 1189, Ex. B)
 - g. 3/11/2021 Tr. of Hai Wang Dep. 542:18-543:5 (ECF No. 1189, Ex. E)
 - h. 4/16/2021 Tr. of Qiangming Li Dep. 341:7-17 (ECF No. 1189, Ex. R)
 - i. 04/5/2021 Tr. of Eric Gu Dep. 25:17-30:8 (ECF No. 1189, Ex. Z)
2. The ZHP Parties have agreed to propose redactions to the following fifty-seven (57) documents by **November 22, 2021**:
 - a. ZHP00291951-53 and ZHP00292071 (ECF No. 826, Ex. 7)
 - b. ZHP01843070 (ECF No. 826, Ex. 8)
 - c. ZHP00016118 (ECF No. 826, Ex. 9)
 - d. ZHP00332358 (ECF No. 826, Ex. 10)
 - e. ZHP01377830 (ECF No. 826, Ex. 12)
 - f. ZHP0249183 (ECF No. 826, Ex. 13)

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- g. ZHP01870979 (ECF No. 826, Ex. 14)
- h. ZHP00021457 (ECF No. 826, Ex. 15)
- i. ZHP01523949 (ECF No. 826, Ex. 16)
- j. ZHP00088946 (ECF No. 826, Ex. 17)
- k. ZHP0211463 (ECF No. 826, Ex. 18)
- l. ZHP00671001 (ECF No. 826, Ex. 19)
- m. ZHP00865176 (ECF No. 826, Ex. 20)
- n. ZHP00865190 (ECF No. 826, Ex. 21)
- o. ZHP00341377 (ECF No. 826, Ex. 36)
- p. ZHP00309217-18 (ECF No. 826, Ex. 37)
- q. ZHP00303912 (ECF No. 826, Ex. 38)
- r. ZHP00320441 (ECF No. 826, Ex. 39)
- s. ZHP00352121 (ECF No. 826, Ex. 40)
- t. ZHP00358575 (ECF No. 826, Ex. 41)
- u. ZHP00351971 (ECF No. 826, Ex. 44)
- v. ZHP00352112 (ECF No. 826, Ex. 45)
- w. ZHP00330625 (ECF No. 826, Ex. 48)
- x. ZHP00072194 (ECF No. 967, Ex. A)
- y. ZHP00120646 (ECF No. 967, Ex. B)
- z. ZHP00120313 (ECF No. 967, Ex. C)
- aa. ZHP00120482 (ECF No. 967, Ex. D)
- bb. ZHP00063901 (ECF No. 967, Ex. E)

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cc. ZHP00122869 (ECF No. 967, Ex. F)
dd. ZHP00122986 (ECF No. 967, Ex. G)
ee. ZHP00122734 (ECF No. 967, Ex. H)
ff. ZHP00125610 (ECF No. 967, Ex. I)
gg. ZHP00126071 (ECF No. 967, Ex. J)
hh. ZHP00137063 (ECF No. 967, Ex. K)
ii. ZHP00063956 (ECF No. 967, Ex. L)
jj. ZHP00137715 (ECF No. 967, Ex. M)
kk. ZHP00139054 (ECF No. 967, Ex. N)
ll. ZHP00141038 (ECF No. 967, Ex. O)
mm. ZHP00146507 (ECF No. 967, Ex. P)
nn. ZHP00076700 (ECF No. 1189, Ex. C)
oo. PRINSTON00083647 (ECF No. 1189, Ex. F)
pp. PRINSTON00077850 (ECF No. 1189, Ex. G)
qq. ZHP00004937 (ECF No. 1189, Ex. H)
rr. PRINSTON00083002-10 (ECF No. 1189, Ex. I)
ss. PRINSTON00083028, 31 (ECF No. 1189, Ex. J)
tt. PRINSTON00074128 (ECF No. 1189, Ex. K)
uu. PRINSTON00081551 (ECF No. 1189, Ex. L)
vv. PRINSTON00081574 (ECF No. 1189, Ex. M)
ww. PRINSTON00162373 (ECF No. 1189, Ex. P)
xx. ZHP00494048 (ECF No. 1189, Ex. Q)

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- yy. ZHP00405108 ((ECF No. 1189, Ex. BB)
 - zz. SOLCO00033301 (ECF No. 1250, Ex. 9)
 - aaa. SOLCO00180393 (ECF No. 1250, Ex. 11)
 - bbb. PRINSTON00083647 (ECF No. 1250, Ex. 12)
 - ccc. PRINSTON00074128 (ECF No. 1250, Ex. 13)
 - ddd. PRINSTON00081551 (ECF No. 1250, Ex. 14)
 - eee. PRINSTON00081574 (ECF No. 1250, Ex. 15)
3. The ZHP Parties have agreed to assess the confidentiality of the following eleven (11) documents that may be subject to confidentiality agreements with third parties by **November 22, 2021**.
- a. ZHP00337032 (ECF No. 826, Ex. 43)
 - b. ZHP02493784 (ECF No. 826, Ex. 50)
 - c. ZHP01893902 (ECF No. 826, Ex. 53)
 - d. ZHP00310874 (ECF No. 826, Ex. 54)
 - e. ZHP02125655 (ECF No. 826, Ex. 55)
 - f. ZHP01976459 (ECF No. 826, Ex. 57)
 - g. HUAHAI-US00008050 (ECF No. 826, Ex. 58)
 - h. ZHP01320376 (ECF No. 1189, Ex. AA)
 - i. ZHP01761094 (ECF No. 1250, Ex. 23)
 - j. ZHP00667853 (ECF No. 1250, Ex. 24)
 - k. PRINSTON00468994 (ECF No. 1250, Ex. 25)
4. The ZHP Parties have agreed to complete their assessment as to any remaining documents by **November 22, 2021**.

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5. The ZHP Parties will agree to de-designate those portions of ECF Nos. 826, 967, 1189, and 1250 consistent with their proposals as to the underlying exhibits.
6. The Parties have agreed to re-assess the confidentiality designations of the Iozzia and Wang deposition transcripts in light of the Court's confidentiality decisions by **November 22, 2021**, and conduct a further meet and confer session dedicated solely to the Iozzia and Wang deposition transcripts in order to narrow the scope of their dispute.

We thank the Court for its courtesies and consideration of this report, and will submit a follow-up report following the parties' second meet and confer.

Respectfully submitted,

/s/ Kelly A. Bonner

Kelly A. Bonner

cc: Alan Klein, Esq.
Seth A. Goldberg, Esq.
Jessica Priselac, Esq.
Christopher Geddis, Esq.